

RAYMOND & RAYMOND

Attorneys at Law

Herbert B. Raymond, Esq.
Jeffrey M. Raymond, Esq.
Kevin de Lyon, Esq.

7 Glenwood Avenue, 4th Fl., Ste. 408
East Orange, NJ 07017
Telephone (973) 675-5622
Facsimile (408) 519-6711

Email: herbertraymond@gmail.com
Website: www.bankruptcylaw123.com

November 21, 2019

Honorable Rosemary Gambardella, U.S.B.J.
U.S. Bankruptcy Court
50 Walnut St., 3rd Floor
Newark, NJ 07102

Re: Jose Argueta, Debtor(s)
18-17989
Chapter 13
Proceeding: Trustee Default Certification
Hearing Date: To Be Determined

Dear Judge Gambardella:

Please accept this letter in opposition to the above matter.

The certification is filed based on the fact that the period to obtain a loan modification called for in debtor's plan expired. This is correct as the loan modification was denied. We have been unable to contact debtor recently in order to file a formal opposition, but from prior conversations we know he is working towards obtaining outside refinancing on the subject property. Therefore, it is our belief that he will be filing a modified plan to call for such.

Therefore, I would request that the court schedule a hearing on the matter.

Respectfully submitted,

/S/ HERBERT B. RAYMOND, ESQ.

HERBERT B. RAYMOND, ESQ.